



Municipality of Anchorage

3000 Arctic Blvd • Anchorage, Alaska 99503-3898 • Telephone (907) 786-5671 • Fax (907) 786-5681
<http://www.muni.org> • <http://www.awwu.biz>



Mayor Mark Begich

Anchorage Water & Wastewater Utility Treatment Division

May 5, 2005



U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: BOD Percent Removal - NPDES Permit No. AK-002255-1

The John M. Asplund Water Pollution Control Facility has been granted a 301(h) waiver from secondary treatment. Although there isn't a percent removal requirement specifically identified in the NPDES permit, there is a requirement in the NPDES regulations that treatment plants with a 301(h) waiver achieve at least a 30 percent BOD removal calculated on a monthly basis. During April 2005, the facility had a BOD removal of 29 percent.

Influent loadings to the facility have declined in recent years, primarily due to a reduction in commercial fish processing activities. This has resulted in a similar decline in the facility's BOD removal capability. Although the decline appears to be leveling off, it is apparent that the Asplund facility's BOD removal figures will occasionally be less than the 30% required by the 301(h) regulations.

The permit renewal application was submitted to EPA in January 2005. The Anchorage Water and Wastewater Utility (AWWU) has requested a change in reporting percent BOD removal from a monthly average basis to a twelve month rolling average. 40 CFR Section 125.6(c)(1) allows an applicant to request a different averaging basis so long as they can demonstrate that:

- The wastewater treatment facility is adequately designed and well operated
 - The applicant will meet all requirements under section 301(h) of the CWA and subpart G of 40 CFR Section 125 with the averaging basis selected
 - The applicant cannot achieve 30 percent removal on a monthly average basis because of circumstances beyond the applicant's control, including relatively high soluble to insoluble BOD ratios on a fluctuating basis and cold climates resulting in cold influent
- AWWU included this demonstration in the application.

Community, Security, Prosperity

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

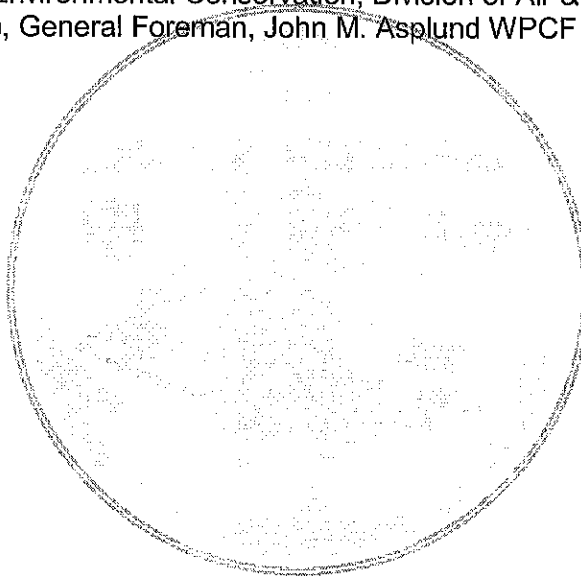
I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,



J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU





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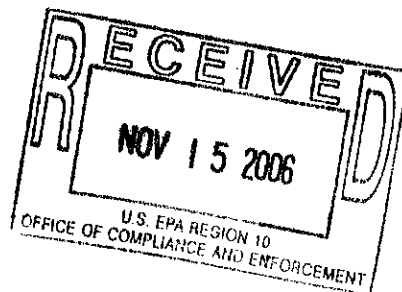


Mayor Mark Begich

Anchorage Water & Wastewater Utility Treatment Division

November 6, 2006

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101



Subject: Fecal Coliform Exceedance
NPDES Permit No. AK-002255-1

The John M. Asplund Water Pollution Control Facility has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL." Two samples during October 2006 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit. The monthly average permit limit of 850 FC MPN/ 100 mL was not exceeded.

October 13, 2006:	5400 FC MPN/100 mL
October 17, 2006:	≥24000 FC MPN/100 mL

The chlorine demand of the wastewater began increasing during the second week in October. In response to resultant lower chlorine residuals, the millivolt setpoint on the ORP controller was adjusted upwards twice before the high coliform count of October 13, 2006 and twice more before the high coliform count on October 17, 2006. Our investigation concluded that the high coliform count on October 17, 2006 was caused by an inadequate chlorine feed, due to the operator not following established procedures when emptying chlorine containers. This incident has been reviewed with the operator to ensure that the established procedure will be followed in future. Our goal remains to review chlorine usage and residuals daily in order to adjust the set point appropriately before getting high coliform counts, rather than in response to them. Our intention is to set the chlorine feed high enough to get adequate fecal coliform kill while minimizing chlorine usage.

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I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

Craig Woolard, P.E., Ph.D.
Director, Treatment Division

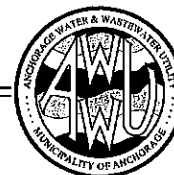
Cc: Alaska Department of Environmental Conservation, Division of Water
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU

Community, Security, Prosperity



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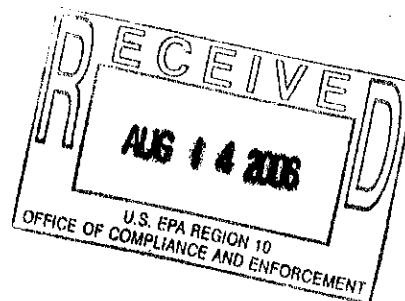
Mayor Mark Begich

Anchorage Water & Wastewater Utility Treatment Division

August 7, 2006

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Exceedance
NPDES Permit No. AK-002255-1



The John M. Asplund Water Pollution Control Facility has a fecal coliform limit that reads *"Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL."* Two samples during July 2006 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit. The monthly average permit limit of 850 FC MPN/ 100 mL was not exceeded.

July 7, 2006:	≥24000 FC MPN/100 mL
July 10, 2006:	3500 FC MPN/100 mL

The chlorine demand of the wastewater began increasing in early July. In response to low residuals and the two high coliform counts, the millivolt setpoint on the ORP controller was adjusted upwards 11 times during July, including on the dates of the two high coliform counts. Our goal remains to review chlorine usage and residuals daily in order to adjust the set point appropriately before getting high coliform counts, rather than in response to them. Our intention is to set the chlorine feed high enough to get adequate fecal coliform kill while minimizing chlorine usage.

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I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

J. Kris Warren
Director, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Water
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU

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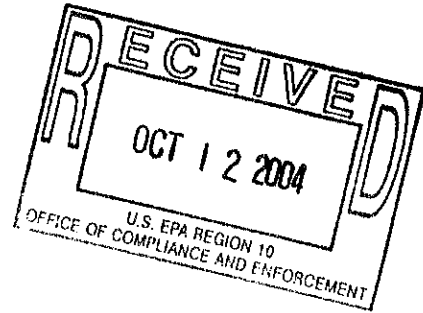


Mayor Mark Begich

Anchorage Water & Wastewater Utility Treatment Division

October 7, 2004

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101



Subject: Fecal Coliform Exceedance - NPDES Permit No. AK-002255-1

The John M. Asplund Water Pollution Control Facility has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL." Two samples during September 2004 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit. The monthly average permit limit of 850 FC MPN/ 100 mL was not exceeded.

September 22, 2004:	3500 FC MPN/100 mL
September 23, 2004:	≥ 24000 FC MPN/100 mL

We analyzed the operational parameters at the time of sampling. Our investigation did not pinpoint specific causes for these relatively high coliform values. The equipment functioned as expected, there were no operational abnormalities, and wastewater characteristics were within the normal range for this time of year. The set point on the chlorine feed controller was decreased on September 20, 2004 due to demand changes and increasing chlorine residual in order to keep the measured residual under the maximum daily permit limit of 1.2 mg/L. The one anomaly noted was that the chlorine residuals measured on these two days were within the range typically providing adequate coliform kill. We continue to review chlorine usage and residuals daily to alert us of the need to adjust the controller set point. Our goal continues to be to set the chlorine feed high enough to get adequate fecal coliform kill without exceeding chlorine residual permit limits.

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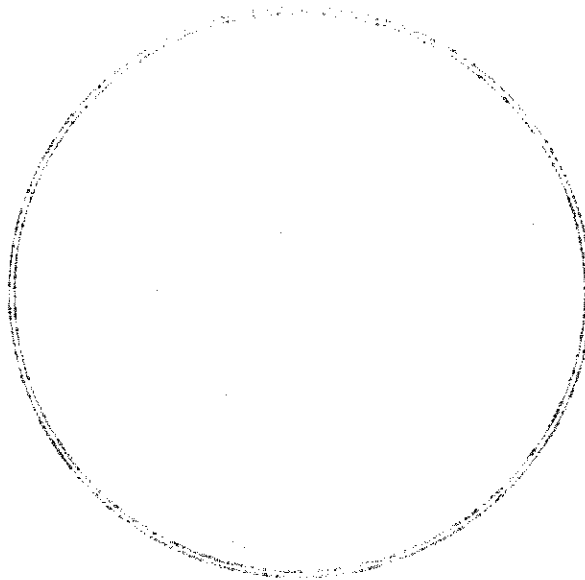
I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

Mark Spano for

J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU





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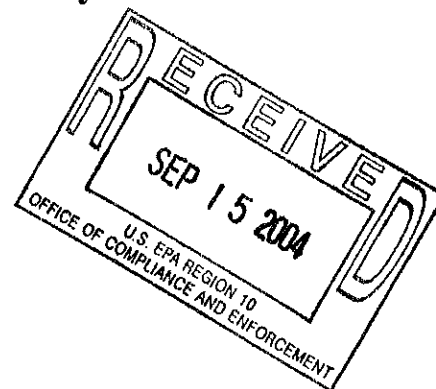


Mayor Mark Begich

Anchorage Water & Wastewater Utility Treatment Division

September 8, 2004

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101



Subject: Fecal Coliform Exceedance - NPDES Permit No. AK-002255-1

The John M. Asplund Water Pollution Control Facility has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL." Five samples during August 2004 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit. The monthly average permit limit of 850 FC MPN/ 100 mL was also exceeded with a result of 1213 FC MPN/ 100 mL.

August 5, 2004:	5400 FC MPN/100 mL
August 16, 2004:	≥ 24000 FC MPN/100 mL
August 23, 2004:	≥ 24000 FC MPN/100 mL
August 24, 2004:	5400 FC MPN/100 mL
August 25, 2004:	16000 FC MPN/100 mL

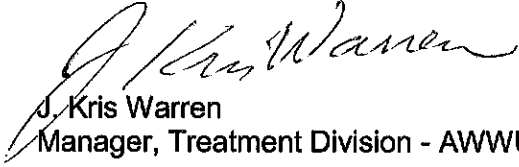
There have been occasional exceedances of the fecal coliform permit limits as we continue to gain experience in adjusting the Oxidation Reduction Potential (ORP) Chlorine Feed Control System for the wide range of conditions that it operates under. We analyzed the operational parameters at the time of each August sample listed above, as well as previous coliform exceedances. Our investigation did not pinpoint specific causes for the coliform exceedances this month. The equipment functioned as expected, there were no operational abnormalities, and wastewater characteristics were within the normal range for this time of year. We increased the set point on the chlorine feed controller on July 30, August 3, August 18, August 19, August 20, August 21 and again on August 26 in an effort to prevent exceedances. We continue to review chlorine usage daily to alert us of the need to adjust the ORP set point. We have developed a spread sheet to electronically gather various data relating to the disinfection system in an effort to establish, through actual operating experience, a method to anticipate controller set point adjustments. Our goal continues to be to meet permit limits while minimizing chlorine usage.

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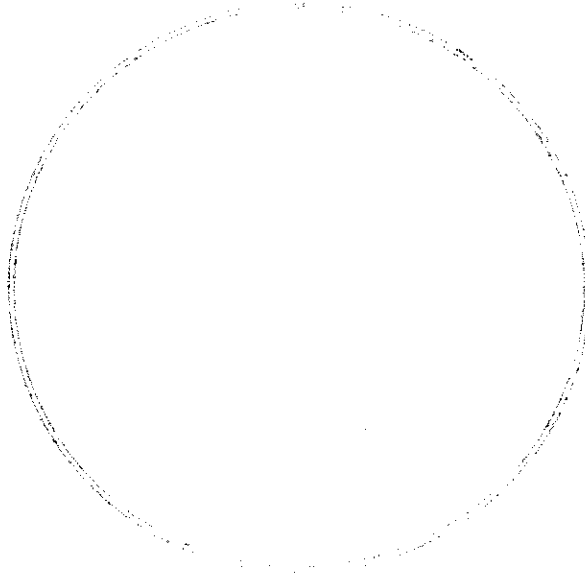
I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,



J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU





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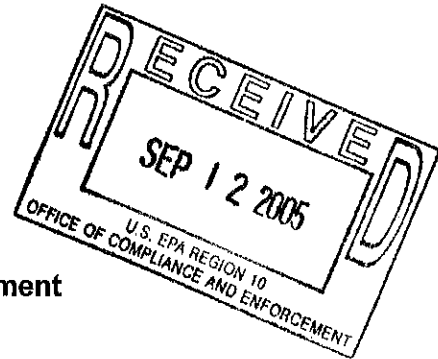


Mayor Mark Begich

Anchorage Water & Wastewater Utility Treatment Division

September 7, 2005

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101



**Subject: Fecal Coliform Exceedance; Flow Measurement
NPDES Permit No. AK-002255-1**

The John M. Asplund Water Pollution Control Facility has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL." Two samples during August 2005 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit. The monthly average permit limit of 850 FC MPN/ 100 mL was not exceeded.

August 9, 2005:
August 26, 2005:

≥24000 FC MPN/100 mL
9200 FC MPN/100 mL

The wastewater for this time of year had an unusually high chlorine demand at times, interspersed with periods of low chlorine demand due to high rainfall. This presented a challenge to setting an optimal chlorine feed controller set point. We continue to review chlorine usage and residuals daily to alert us of the need to adjust the set point. Our goal continues to be to set the chlorine feed high enough to get adequate fecal coliform kill without exceeding chlorine residual permit limits.

The permit also requires continuous flow monitoring and flow-proportional influent and effluent sampling. On August 1, the flow monitor started to malfunction. AWWU instrument technicians determined that the transducer was malfunctioning and a new one was ordered. The transducer was installed and the system calibrated. It was then discovered that the receiver/transmitting unit was malfunctioning as well and needed to be completely replaced. The unit was put on order and is expected to be received, installed and working properly by mid-September.

Therefore, the flows for August are estimated by a visual reading of the flume yardstick at least every three hours. These eight readings per day are averaged to get the daily flow estimate. The influent and effluent composite samples were time composites during the month, rather than flow proportional composites.

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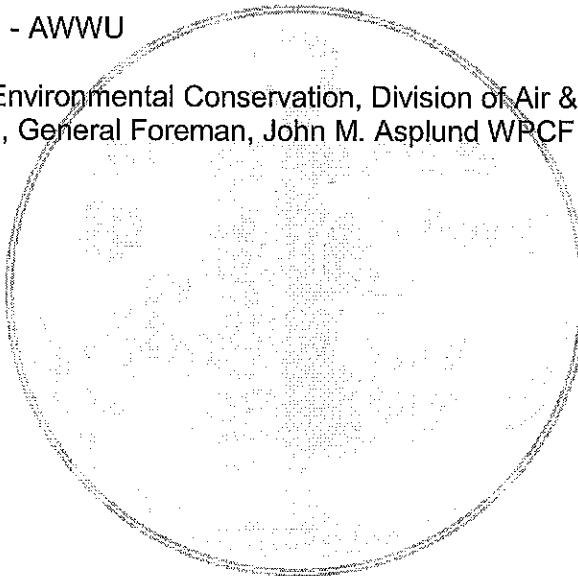
I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,



J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU





Mayor Mark Begich

Municipality of Anchorage

Anchorage Water and Wastewater Utility

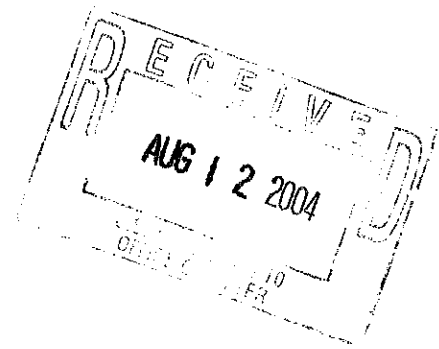
3000 Arctic Boulevard • Anchorage, Alaska 99503

Asplund Wastewater Treatment Facility

(907) 751-2200 fax: (907) 248-6836



August 6, 2004



U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Exceedance - NPDES Permit No. AK-002255-1

The John M. Asplund Water Pollution Control Facility has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL." Four samples during July 2004 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit:

July 19, 2004:	≥ 24000 FC MPN/100 mL
July 21, 2004:	16000 FC MPN/100 mL
July 26, 2004:	16000 FC MPN/100 mL
July 27, 2004:	≥ 24000 FC MPN/100 mL

There have been occasional exceedances of the fecal coliform permit limits as we continue to gain experience in adjusting the Oxidation Reduction Potential (ORP) Chlorine Feed Control System for the wide range of conditions that it operates under. Our investigation did not pinpoint specific causes for the coliform exceedances this month. The equipment functioned as expected, there were no operational abnormalities, and wastewater characteristics were within the normal range for this time of year. We analyzed the operational parameters at the time of each July sample listed above, as well as previous coliform exceedances. We increased the set point on the chlorine feed controller on July 26 and again on July 29 in an effort to prevent future exceedances. We continue to review usage daily to alert us of the need to adjust the ORP set point. Our goal continues to be to meet permit limits while minimizing chlorine usage.

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I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

Mark Spano for

J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU

Community, Security, Prosperity



Mayor Mark Begich

Municipality of Anchorage

Anchorage Water and Wastewater Utility

3000 Arctic Boulevard • Anchorage, Alaska 99503

Asplund Wastewater Treatment Facility

(907) 751-2200 fax: (907) 248-6836



April 9, 2004

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Exceedance - NPDES Permit No. AK-002255-1

The John M. Asplund Water Pollution Control Facility has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL."

Three samples during March 2004 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit:

March 8, 2004:	9,200 FC MPN/100 mL
March 10, 2004:	>24,000 FC MPN/100 mL
March 30, 2004:	16,000 FC MPN/100 mL

There have been occasional exceedances of the residual or coliform permit limits as we gain experience in adjusting the Oxidation Reduction Potential (ORP) Chlorine Feed Control System for the wide range of conditions that it operates under. Our investigation did not pinpoint specific causes for the coliform exceedances this month. The equipment functioned as expected, there were no operational abnormalities, and wastewater characteristics were within the normal range for this time of year. We analyzed the operational parameters at the time of the March 2004, as well as previous coliform exceedances, and made two changes in an effort to prevent future exceedances. The ORP setpoint was once again increased. We also established a new operational guideline for chlorine dosage and will review usage daily to alert us of the need to adjust the ORP set point. Our goal continues to be to meet permit limits while minimizing chlorine usage.

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I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

Mark Spano, for

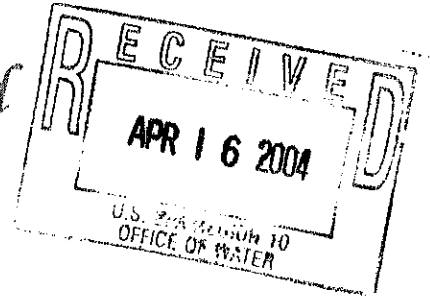
J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Mark Spano, Water Quality Supervisor -AWWU
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU

Community, Security, Prosperity

ASPLUND Wastewater Treatment Facility

Monitoring Period
2004



☐ JANUARY

☐ JULY

☐ FEBRUARY

☐ AUGUST

☒ MARCH

☐ SEPTEMBER

☐ APRIL

☐ OCTOBER

☐ MAY

☐ NOVEMBER

☐ JUNE

☐ DECEMBER



Mayor Mark Begich

Municipality of Anchorage

Anchorage Water and Wastewater Utility

3000 Arctic Boulevard • Anchorage, Alaska 99503

Asplund Wastewater Treatment Facility

(907) 751-2200 fax: (907) 248-6836



February 9, 2004

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Exceedance

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL."

Two samples during January 2004 exceeded 2600 FC MPN/100 mL, which exceeds the 10% limit:

January 11, 2004:	3,500 FC MPN/100 mL
January 13, 2004:	9,200 FC MPN/100 mL

These higher than normal levels of fecal coliform resulted from the Oxidation Reduction Potential (ORP) Chlorine Feed Control System not increasing feed rate fast enough to keep up with rising chlorine demand. Both samples were collected during the same time of day, when the chlorine demand typically increases. Our 2003 coliform exceedances were reviewed to further evaluate the relationship between ORP set point and coliform levels. Based on the investigation, the controller set point has been increased in an effort to eliminate future exceedances. We have had occasional exceedances of the residual or coliform permit limits as we gain experience in adjusting the ORP for the wide range of conditions that it operates under. Our goal continues to be to meet permit limits while minimizing chlorine usage.

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Sincerely,

J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Mark Spano, Water Quality Supervisor - AWWU
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU

Community, Security, Prosperity

ANCHORAGE WATER & WASTEWATER UTILITY

"A New Standard of Excellence"

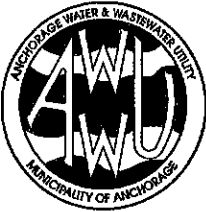
Treatment Division

3000 Arctic Blvd.

Anchorage, Alaska 99503-3813

Phone (907) 786-5671 Fax (907) 786-5681

<http://www.awwu.biz>



Owned by the
Municipality of Anchorage



2002
Mark Begich,
Mayor

October 8, 2003

OCT 14 2003

U.S. EPA Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, WA 98101

**Reference: NPDES Permit #AK-002255-1, John M. Asplund WWTF
September 2003 Permit Exceedance**

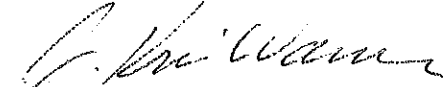
On September 4, 2003 the Asplund Wastewater Treatment Facility had an exceedance of the narrative permit limitation *"There shall be no discharge of floating solids, visible foam, or oily wastes which produce a sheen on the surface of the receiving water."* This occurred when operators conducted annual beach tower sluice gate maintenance, which involves opening and closing the sluice gate at the bottom of the beach tower. The beach tower has a weir in it that maintains a head on the water in the chlorine detention tunnel and keeps the Cook Inlet salt water/silt from backing up the outfall into the chlorine detention tunnel. Some built-up debris flushed from the tower when the gate was opened. The work occurred during an incoming tide that peaked around 2:30 PM.

Around 3:00 PM AWWU received a call about grease on the beach at Pt. Woronzof from a person who had been walking on the beach. Upon investigation we found a line of grease balls and some plastic debris along the high tide mark. The grease line extended from the beach tower approximately 7,000 feet along the beach/mudflat to the northeast. AWWU called the Alaska Department of Environmental Conservation at 4:15 PM to report the incident and shortly thereafter had a cleanup crew on the beach. Our cleanup crew cleaned up the large majority of the grease balls and small plastic debris into garbage bags by 8:00 PM. The high tide that occurred around 2:30 AM that night was higher than the earlier high tide and left a much thinner and shorter line of grease balls. A crew cleaned up the remainder of the debris on Friday September 5. We estimate the total volume of material collected to be about four cubic yards. The incident was called in to the NPDES Compliance Hotline on September 5 by Jack Knue, the Asplund General Foreman.

We intend to come up with an alternate way of exercising the gate to prevent the discharge of this type of material prior to the next scheduled preventive maintenance.

Should you have any questions, please contact me by phone at (907) 564-2799 or by email at <mailto:kris.warren@awwu.biz>.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Kris Warren", written in a cursive style.

J. Kris Warren
Manager, Treatment Division

cc: ADEC Division of Air and Water Quality, Southcentral Office
John F. (Jack) Knue, General Foreman, AWWU
Mark Spano, Water Quality Supervisor, AWWU

Master
2428

NPDES Non-Compliance Reporting - Summary of Call

Call was Received By **Athena Ralstin** **Date of Call** **9/5/2003** **Time of Call** **Date of NonComp** **9/4/2003**

Add Record

Facility Name **Municipality of Anchorage (COOK INLET)** **Permit #** **AK0022551**

Find Record

Name of Caller **Jack Canoe** **Phone # of Caller** **9072438873**

Close Form

Nature Of Noncompliance **Effluent Limit Violation** **Is the situation urgent?**

Print Record

Parameters

Parameter	Sample Result	Permit Limit	Unit	Master
	0	0		2428

Violation Descrip and Comments

During scheduled maintenance the effluent line beach tower had a bypass about 3 cubic yards of grease balls and plastic washed up on the beach line. It was cleaned up the next day.

Other Comments

Key

ANCHORAGE WATER & WASTEWATER UTILITY

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Treatment Division

Point Woronzof

3000 Arctic Blvd.

Anchorage, Alaska 99503-3813

(907) 243-8873

<http://www.awwu.biz>



Owned by the
Municipality of Anchorage



2002

Mark Begich,
Mayor

August 8, 2003

AUG 11 2003

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Exceedances

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, exceeded the monthly average fecal coliform bacteria permit limit of 850 FC MPN/100ml. In addition, more than 10% of the samples exceeded 2600 FC MPN/100mL.

The July 2003 fecal coliform bacteria monthly average was 1141 FC MPN/100mL. Five samples exceeded the 2600 FC MPN/100mL:

July 1, 2003:	>24,000 FC MPN/100mL
July 2, 2003:	3,500 FC MPN/100mL
July 20, 2003:	>24,000 FC MPN/100mL
July 28, 2003:	>24,000 FC MPN/100mL
July 29, 2003:	3,500 FC MPN/100mL

These higher than normal levels of fecal coliform resulted from the continuing adjustment of an Oxidation Reduction Potential (ORP) Chlorine Feed Control System. As a result of these instances, the controller set point was increased on July 7 and 30, in an effort to eliminate future occurrences. Our goal in installing this control system is to effectively meet permit limits while minimizing chlorine usage. We have had occasional exceedances of the residual or coliform permit limits as we gain experience in adjusting the ORP for the wide range of operating conditions. We will continue to do our best to avoid any such exceedances in future.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,



J. Kris Warren
Manager, Treatment Division

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Mark Spano, Water Quality Supervisor, AWWU
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF, AWWU

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Anchorage



2002

Mark Begich,
Mayor

July 9, 2003

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Exceedance

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/100 mL."

Two samples during June 2003 exceeded 2600 FC MPN/100 mL:

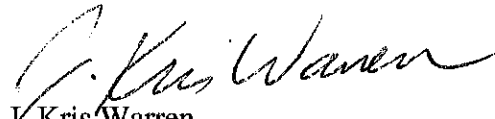
June 9, 2003:	>24,000 FC MPN/100 mL
June 30, 2003:	>24,000 FC MPN/100 mL

These higher than normal levels of fecal coliform resulted from the continuing adjustment of an Oxidation Reduction Potential (ORP) Chlorine Feed Control System. In this instance, the controller setpoint was increased in an effort to eliminate future occurrences. Our goal in installing this control system is to effectively meet permit limits while minimizing chlorine usage. We have had occasional exceedances of the residual or coliform permit limits as we gain experience in adjusting the ORP for the wide range of conditions that it operates under. We continue to review data collected from the ORP controller on a daily basis, adjust auto probe wash times as we seek better control and seek the optimum manual probe wash frequency. We have scheduled a project to relocate the chlorine rapid mixer this year. This is expected to further improve the mixing of the chlorine with the plant effluent thus further improving the efficiency of the disinfection process and eliminating all coliform exceedances. We will continue to do our best to avoid any such exceedances in future.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Kris Warren". The signature is fluid and cursive, with a large initial "J" and "K".

J. Kris Warren

Manager, Treatment Division

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Mark Spano, Water Quality Supervisor, AWWU
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF, AWWU

ANCHORAGE WATER & WASTEWATER UTILITY



George P. Wuerch,
Mayor

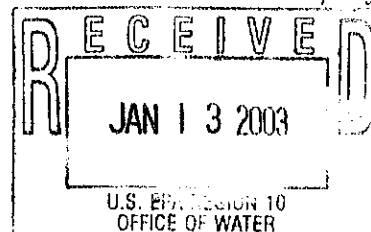
Treatment Division

3000 Arctic Boulevard
Anchorage, Alaska 99503-3898
<http://www.awwu.ci.anchorage.ak.us>



Owned by the
Municipality of Anchorage

January 9, 2003



U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Exceedance

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/ 100 mL."

Three samples during December 2002 exceeded 2600 FC MPN/100 mL:

December 10, 2002:	>24,000 FC MPN/100 mL
December 11, 2002:	>24,000 FC MPN/100 mL
December 16, 2002:	>24,000 FC MPN/100 mL

These higher than normal levels of fecal coliform resulted from the continuing adjustment of an Oxidation Reduction Potential (ORP) Chlorine Feed Control System installed November 2001. In this instance, the controller setpoint was increased in an effort to eliminate future occurrences. Our goal in installing this control system is to effectively meet permit limits while minimizing chlorine usage. We have had occasional exceedances of the residual or coliform permit limits as we gain experience in adjusting the ORP for the wide range of conditions that it operates under. We will continue to do our best to avoid any such exceedances in future.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

J. Kris Warren
Manager, Treatment Division

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Mark Spano, Water Quality Supervisor, AWWU
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF, AWWU

ASPLUND

Wastewater Treatment Facility

Monitoring Period
2002

☐ JANUARY

☐ JULY

☐ FEBRUARY

☐ AUGUST

☐ MARCH

☐ SEPTEMBER

☐ APRIL

☐ OCTOBER

☐ MAY

☐ NOVEMBER

☐ JUNE

☒ DECEMBER

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Anchorage



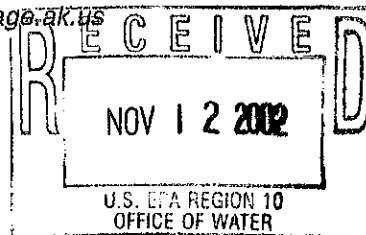
2002

George P. Wuerch,
Mayor



Owned by the
Municipality of Anchorage

November 1, 2002



U.S. EPA Region 10

NPDES Compliance Unit (OW-133)

1200 Sixth Avenue

Seattle, WA 98101

Reference: NPDES Permit #AK-002255-1, John M. Asplund WWTF

To Whom It May Concern:

The Final Effluent Daily Chlorine Residual Average Limit of 1.2 mg/L was exceeded on October 27, 2002 with a Daily Chlorine Residual Average of 1.32 mg/L.

This exceedance was due to an operational malfunction of the recently installed Oxidation Reduction Potential (ORP) Chlorine Feed Control and Monitoring System, along with misunderstandings of the operational procedures. We continue to inform and train the staff on the operations and regulatory requirements of this system as we build our working knowledge in the application of this new technology.

Our treatment facility staff will continue to do everything possible to prevent permit limit exceedances.

Should you have any questions, please call me at (907) 243-8873.

Sincerely,

John F. Knue Jr.

General Foreman, AWWU

John M. Asplund WWTF

cc: Kris Warren, AWWU
Brian Crewdson, AWWU
Anchorage Office, EPA
SouthCentral Office, ADEC

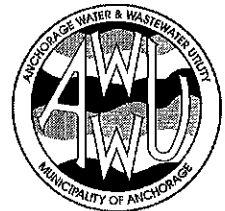
ANCHORAGE WATER & WASTEWATER UTILITY



George P. Wuerch,
Mayor

Treatment Division

3000 Arctic Boulevard
Anchorage, Alaska 99503-3898
<http://www.awwu.ci.anchorage.ak.us>



Owned by the
Municipality of Anchorage

March 6, 2002

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101

Subject: Fecal Coliform Limit

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/mL." (Reference permit Part I.A.4. Table 1, footnote 2 - p. 4 of 39.) I suspect that this may be an error in the permit and that it was intended that the limit be 2600 FC MPN/100 mL. This was the limit in the preceding permit prior to the June 2000 reissuance. A review of the fact sheet and the draft permit for the 2000 reissuance seems to indicate that the intention was to carry over this limit unchanged to new permit.

Four samples during February 2002 exceeded 2600 FC MPN/100 mL:

February 9, 2002: 2800 FC MPN/100 mL
February 11, 2002: 5400 FC MPN/100 mL
February 26, 2002: 9200 FC MPN/100 mL
February 27, 2002: 16000 FC MPN/100 mL

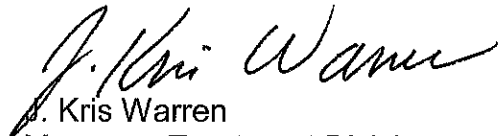
These samples do not exceed the "not more than 10%" permit limit of 2600 FC MPN/mL. Therefore, this has not been reported as an exceedance on the DMR. However, they are being reported because of the suspected error in the permit. This is the third time under the new permit that this situation has occurred. It occurred in October 2000 and January 2002. A letter was sent to your office with the DMR both times reporting the results and explaining the situation with the permit limit.

These higher than normal levels of fecal coliform resulted from adjustment of a newly installed Oxidation Reduction Potential (ORP) Chlorine Feed Control System. Our goal in installing this control system is to effectively meet permit limits while minimizing chlorine usage. We expected that during start-up and adjustment of the ORP that exceedances of the residual or coliform permit limits might occur. We will continue to do our best to avoid any exceedances.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,


J. Kris Warren
Manager, Treatment Division

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Mark Spano, Water Quality Supervisor, AWWU
Jack Knue, General Foreman, John M. Asplund WPCF, AWWU

ANCHORAGE WATER & WASTEWATER UTILITY



George P. Wuerch,
Mayor

Treatment Division

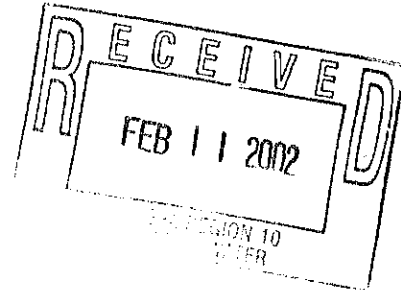
3000 Arctic Boulevard
Anchorage, Alaska 99503-3898
<http://www.awwu.ci.anchorage.ak.us>



Owned by the
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February 7, 2002

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101



Subject: Fecal Coliform Permit Limit

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/mL." (Reference permit Part I.A.4. Table 1, footnote 2 - p. 4 of 39.) I suspect that this may be an error in the permit and that it was intended that the limit be 2600 FC MPN/100 mL. This was the limit in the permit prior to the June 2000 reissuance. A review of the fact sheet and the draft permit seems to indicate that the intention was to carry this limit over unchanged into the new permit.

Three samples during January 2002 exceeded 2600 FC MPN/100 mL:

January 7, 2002:	5400 FC MPN/100 mL
January 8, 2002:	3500 FC MPN/100 mL
January 9, 2002:	16000 FC MPN/100 mL

These samples do not exceed the permit limit of 2600 FC MPN/mL. Therefore, they have not been reported as an exceedance on the DMR. However, they are being brought to your attention because of the suspected error in the permit. This is the second time under the new permit that this situation has occurred. It occurred in October 2000 and a letter was sent to your office explaining the situation (copy enclosed).

These higher than normal levels of fecal coliform resulted from adjustment of a newly installed Oxidation Reduction Potential (ORP) Chlorine Feed Control System. Our goal in installing this control system is to effectively meet permit limits while reducing chlorine usage. We expected that during start-up and adjustment of the ORP that exceedances of the residual or coliform permit limits might occur, but will continue to do our best to avoid any exceedances.

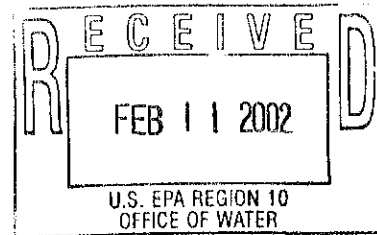
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,

Mark Spano for

J. Kris Warren
Manager, Treatment Division



Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Mark Spano, Water Quality Supervisor, AWWU
Jack Knue, General Foreman, John M. Asplund WPCF, AWWU

ANCHORAGE WATER & WASTEWATER UTILITY



George P. Wuerch,
Mayor

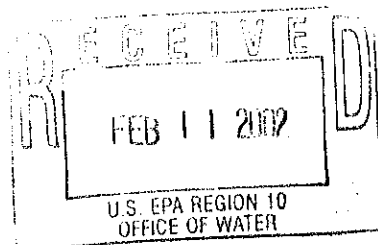
Treatment Division
Laboratory Services Section
3000 Arctic Boulevard
Anchorage, Alaska 99503-3898
<http://www.awwu.ci.anchorage.ak.us>



Owned by the
Municipality of Anchorage

November 8, 2000

Randall F. Smith, Director
Office of Water
U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101



Subject: Fecal Coliform Permit Limit

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/mL." (Reference permit Part I.A.4. Table 1, footnote 2 - p. 4 of 39.) I suspect that this may be an error in the permit and that it was intended that the limit be 2600 FC MPN/100 mL. This was the limit in the permit prior to the June 2000 reissuance. A review of the fact sheet and the draft permit seems to indicate that the intention was to carry this limit over unchanged into the new permit.

Four samples during October exceeded 2600 FC MPN/100 mL:

October 5, 2000:	>24000 FC MPN/100 mL
October 23, 2000:	3500 FC MPN/100 mL
October 30, 2000:	5400 FC MPN/100 mL
October 31, 2000:	5400 FC MPN/100 mL

These samples do not exceed the permit limit of 2600 FC MPN/mL. Therefore, they have not been reported as an exceedance on the DMR. However, they are being brought to your attention because of the suspected error in the permit. This is the first time under the new permit that this situation has occurred.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I can be contacted at (907) 266-5217 should you have any questions.

Sincerely,

Mark Spano

Mark Spano
Laboratory Services Supervisor

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
Kris Warren, Treatment Division Manager, AWWU
Jack Knue, General Foreman, John M. Asplund WPCF, AWWU

ANCHORAGE WATER & WASTEWATER UTILITY

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Treatment Division

Point Woronzof

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Anchorage, Alaska 99503-3813

(907) 243-8873

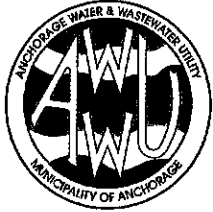
<http://www.awwu.ci.anchorage.ak.us>

Anchorage



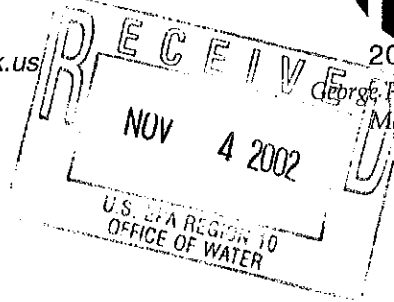
2002

George P. Wuerch,
Mayor



Owned by the
Municipality of Anchorage

November 1, 2002



U.S. EPA Region 10

NPDES Compliance Unit (OW-133)

1200 Sixth Avenue

Seattle, WA 98101

Reference: NPDES Permit #AK-002255-1, John M. Asplund WWTF

To Whom It May Concern:

The Final Effluent Daily Chlorine Residual Average Limit of 1.2 mg/L was exceeded on October 27, 2002 with a Daily Chlorine Residual Average of 1.32 mg/L.

This exceedance was due to an operational malfunction of the recently installed Oxidation Reduction Potential (ORP) Chlorine Feed Control and Monitoring System, along with misunderstandings of the operational procedures. We continue to inform and train the staff on the operations and regulatory requirements of this system as we build our working knowledge in the application of this new technology.

Our treatment facility staff will continue to do everything possible to prevent permit limit exceedances.

Should you have any questions, please call me at (907) 243-8873.

Sincerely,

John F. Knue Jr.

General Foreman, AWWU

John M. Asplund WWTF

cc: Kris Warren, AWWU
Brian Crewdson, AWWU
Anchorage Office, EPA
SouthCentral Office, ADEC

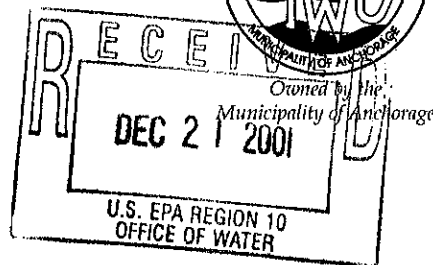


George P. Wuersch,
Mayor

ANCHORAGE WATER & WASTEWATER UTILITY

Treatment Division

3000 Arctic Blvd.
Anchorage, Alaska 99503
(907) 564-2799
<http://www.ci.anchorage.ak.us>



December 14, 2001

U.S. EPA Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, WA 98101

Reference: NPDES Permit #AK-002255-1, John M. Asplund WWTF

The purpose of this letter is to report a violation of the referenced discharge permit. The final effluent Maximum Daily Total Residual Chlorine limit of 1.2 mg/L was exceeded Thursday, December 6, 2001 with a result of >1.2 mg/L.

Five of the 24 daily readings were recorded as >2.0 mg/L, 2.0 being the highest reading the instrument will record. Averaging the numbers without the > sign resulted in an average of 1.2, so the real average is a bit higher. Should this situation occur in future, we've modified the method so as to measure a definite number rather than a greater than (>) value.

The high daily average residual resulted from adjustment of a newly installed Oxidation Reduction Potential (ORP) Chlorine Feed Control System. Our goal in installing this control system is to effectively meet permit limits while reducing chlorine usage.

This unit has the ability to collect data continuously and stores the last eleven days of data collected. This data was reviewed and compared to the typical operational data to develop startup parameters before the unit was placed in control. The unit was in total control for three of the chlorine feed rate changes causing the higher than normal residuals. The other two were no longer than 30 minutes in length and were necessary to observe the operation of the new feed control system to determine reaction times and other information to get the unit adjusted. Since last week when the unit was first put in operation, numerous adjustments have been made in order to work toward better control of the complete disinfection system.

It is to be expected that during start-up and adjustment of this instrument that exceedances of the residual and/or fecal coliform limits may occur. We will continue to do our best to avoid or minimize permit limit exceedances while getting this system fully operational.

We inadvertently failed to report this limit exceedance within the required 24 hour period. We have modified our standard operating procedures to prevent such an omission should another violation of this nature occur in the future.

Should you have any questions, please call me at (907) 564-2799.

Sincerely,


J. Kris Warren
Manager, Treatment Division

cc: Southcentral Office, ADEC